

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 9-1464-00031/00292 Modification Number: 3



07/06/2006

Facility Identification Data

Name: E I DUPONT YERKES PLANT
Address: SHERIDAN DR AT RIVER RD
TONAWANDA, NY 14150

Owner/Firm

Name: E I DUPONT DE NEMOURS & CO
Address: 1007 MARKET ST
WILMINGTON, DE 19898, USA
Owner Classification: Corporation/Partnership

Permit Contacts

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Permit Description

Introduction

The Title V operating air permit is intended to be a document containing only enforceable terms and conditions as well as any additional information, such as the identification of emission units, emission points, emission sources and processes, that makes the terms meaningful. 40 CFR Part 70.7(a)(5) requires that each Title V permit have an accompanying "...statement that sets forth the legal and factual basis for the draft permit conditions". The purpose for this permit review report is to satisfy the above requirement by providing pertinent details regarding the permit/application data and permit conditions in a more easily understandable format. This report will also include background narrative and explanations of regulatory decisions made by the reviewer. It should be emphasized that this permit review report, while based on information contained in the permit, is a separate document and is not itself an enforceable term and condition of the permit.

Summary Description of Proposed Project

This is a minor permit modification for the addition of a new batch vapor machine subject to 40 cfr 63, MACT, subpart T. Once Dupont qualifies the new machine they will remove the cold cleaning machine.

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Attainment Status

E I DUPONT YERKES PLANT is located in the town of TONAWANDA in the county of ERIE. The attainment status for this location is provided below. (Areas classified as attainment are those that meet all ambient air quality standards for a designated criteria air pollutant.)

Criteria Pollutant	Attainment Status
Particulate Matter (PM)	ATTAINMENT
Particulate Matter < 10µ in diameter (PM10)	ATTAINMENT
Sulfur Dioxide (SO2)	ATTAINMENT
Ozone*	MARGINAL NON-ATTAINMENT
Oxides of Nitrogen (NOx)**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT

* Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of nitrogen (NOx) which are ozone precursors.

** NOx has a separate ambient air quality standard in addition to being an ozone precursor

Facility Description

The Dupont Yerkes site contains two independent businesses.: Corian (S.I.C. 3088) and Tedlar (S.I.C. 3081).

Permit Structure and Description of Operations

The Title V permit for E I DUPONT YERKES PLANT is structured in terms of the following hierarchy: facility, emission unit, emission point, emission source and process.

A facility is defined as all emission sources located at one or more adjacent or contiguous properties owned or operated by the same person or persons under common control. The facility is subdivided into one or more emission units (EU). Emission units are defined as any part or activity of a stationary facility that emits or has the potential to emit any federal or state regulated air pollutant. An emission unit is represented as a grouping of processes (defined as any activity involving one or more emission sources (ES) that emits or has the potential to emit any federal or state regulated air pollutant). An emission source is defined as any apparatus, contrivance or machine capable of causing emissions of any air contaminant to the outdoor atmosphere, including any appurtenant exhaust system or air cleaning device.

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[NOTE: Indirect sources of air contamination as defined in 6 NYCRR Part 203 (i.e. parking lots) are excluded from this definition]. The applicant is required to identify the principal piece of equipment (i.e., emission source) that directly results in or controls the emission of federal or state regulated air pollutants from an activity (i.e., process). Emission sources are categorized by the following types:

- combustion - devices which burn fuel to generate heat, steam or power
- incinerator - devices which burn waste material for disposal
- control - emission control devices
- process - any device or contrivance which may emit air contaminants that is not included in the above categories.

E I DUPONT YERKES PLANT is defined by the following emission unit(s):

Emission unit U00003 - Corian sheet line 2:

The new batch vapor machine has a new emission source, but uses a current emission point, # 58.

It is further defined by the following process(es):

Process: 03D is located at corian sheet, Building 100 - New batch vapor cleaning machine is added to the current emission point # 58. It is a source of Methylene Chloride emissions.

Emission unit 000002 - Emission unit 0-00002 is identified as Corian(R) Sheet Line #1. Corian is cast as a sheet. The sheet is trimmed, cut, and finished. There are three processes associated with this emission unit: 002- Manufacture of Corian(R) Sheet Line #1 (VOC Sources); 02A- Insignificant activities associated with Corian(R) Sheet Line #1; and, 02C - Manufacture of Corian(R) Sheet Line #1 (particulate sources).

Emission unit 000002 is associated with the following emission points (EP):

00007, 00008, 0007A, 00120, 00130, 00134, 00135, 00137, 00139, 00172, 00180, 00198, 00202, 00203, 00204, 00205, 00206, 00207, 00208, 00209, 00210, 00211, 00221, 00243

It is further defined by the following process(es):

Process: 002 is located at Corian Sheet Line #1, Building 200 - Process 002 includes the sources which result in volatile organic compound (VOC) emissions during the manufacturing of Corian(R) Sheet Line #1. The manufacturing process consists of combining methyl methacrylate with an inorganic filler, pigment and initiator. The mixture is spread on the casting belt where the continuous sheet is allowed to polymerize and cool.

Process: 020 is located at Building 200 - Baghouse associated with the Sheetline #1. It is a source of particulate emissions.

Process: 02A is located at Corian Sheet Line #1, Building 200 - Process 02A includes the insignificant activities associated with the manufacturing of Corian(R) Sheet Line #1.

Process: 02C is located at Corian Sheet Line #1, Building 200 - Process 02C includes sources which emit particulate emissions during the manufacture of Corian(R) Sheet Line #1.

Emission unit 000010 - Emission unit 0-00010 is identified as the Tedlar(R) SP Line. A mixture of polymerized vinyl fluoride and additives are coated onto a continuous carrier web. The film is cured and the web may, or may not, be removed. There is one process associated with this emission unit: - 010- Manufacture of Tedlar(R) - SP Line.

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Emission unit 000010 is associated with the following emission points (EP):
00027, 00157, 00166

It is further defined by the following process(es):

Process: 010 is located at SP Line, Building TEDLAR SP - Process 010 includes the sources which result in volatile organic compound (VOC) emissions from the manufacture of Tedlar(R) - SP Line. A variety of film products may be produced by this coating process. Additionally, this process may use a variety of raw materials that have the same applicable requirements. The emission rate potential and potential to emit information for this process was determined on a compound by compound basis. This was determined by taking the product with the largest potential to emit a given compound and then the potential to emit was estimated assuming the product was produced 8760 hours per year.

Emission unit 000009 - Emission unit 0-00009 is identified as Tedlar(R) Oriented Line #1.

Polymerized vinyl fluoride is combined with dimethyl acetamide (cas # 127-19-5) and additives. The mixture is extruded through a die and stretched to form a film as the dimethyl acetamide is removed. The film is wound onto mill rolls. There are four processes associated with this emission unit: - 009- Manufacture of Tedlar(R) - Oriented Line #1; - 09A- Insignificant activities associated with Tedlar(R) - Oriented Line #1; 09B- VOC storage tanks associated with the Manufacture of Tedlar(R) - Oriented Line #1, and 09C - particulate sources.

Emission unit 000009 is associated with the following emission points (EP):

00002, 00003, 00011, 00016, 00017, 00018, 00019, 00022, 00023, 0002A, 0003A, 0004A, 0004B, 00110, 00112, 00117, 00122, 00123, 00124, 00128, 00129, 00147, 00148

It is further defined by the following process(es):

Process: 009 is located at Oriented Line #1, Building TEDLAR(R) - Process 009 includes the sources which result in volatile organic compound (VOC) emissions during the manufacturing of Tedlar(R) - Oriented Line #1. The Tedlar mixture (dimethylacetamide, pigments and additives) is extruded through a die to produce a sheet of Tedlar film. The film is cooled in a quench tank and enters a five zone oven to be heated, cooled, and upon exit is wound on rollers.

Process: 09A is located at Oriented Line #1, Building TEDLAR(R) - Process 09A includes the insignificant activities associated with Tedlar(R) - Oriented Line #1. The activities include a chipper, the chip room exhaust, the mix room exhaust, and the corona treating discharge.

Process: 09B is located at Oriented Line #1, Building TEDLAR(R) - Process 09B includes VOC storage tanks associated with the manufacture of Tedlar(R) - Oriented Line #1. This process includes eight (8) VOC tanks with a capacity of greater than 750 gallons which have been listed in the permit.

Process: 09C is located at Building TEDLAR(R) - Process 09C includes sources which emit particulate emissions during the Tedlar Process.

Emission unit 000008 - Emission unit 0-00008 is identified as Tedlar(R) Polymer. Vinyl fluoride, produced off-site, is polymerized and the polymer is decanted, filtered, and dried. There are three processes associated with this emission unit including: 008- VOC sources, 08A- insignificant activities, and 08C-particulate sources.

Emission unit 000008 is associated with the following emission points (EP):

00005, 00020, 00030, 00105, 00106, 00107, 00125, 00126, 00127, 00183, 00184, 00185, 00186

It is further defined by the following process(es):

Process: 008 is located at Tedlar(R) Polymer, Building 4140 - Process 008 includes the sources which result in volatile organic compound (VOC) emissions during the Tedlar(R) Polymer Process. This polymerization process begins with vinyl fluoride and uses a reactor to convert it to a slurry of polyvinyl



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fluoride, vinyl fluoride, and water. The slurry passes to high and low pressure separators and a flash tank. The slurry is then filtered, mixed with air, and heated in dryers. A baghouse separates the entrained air and water vapor from the polyvinyl fluoride. The polyvinyl fluoride is packaged for distribution or stored.

Process: 08A is located at Tedlar (R) Polymer, Building 4140 - Process 08A includes the insignificant activities associated with the manufacturing of Tedlar(R) Polymer.

Process: 08C is located at Tedlar Polymer, Building 4140 - Process 08C includes sources which emit particulate emissions during the Tedlar Polymer Process.

Emission unit 000006 - Emission unit 0-00006 includes: (1) Research & Development , (2) Maintenance, and (3) Quality Laboratory Testing activities. These activities may be classified as exempt sources under 6 NYCRR Part 201-3.3; however, some sources may have an applicable requirement and associated monitoring. Thus, only the sources which are subject to an applicable requirement have been identified in the permit. However, emissions from all the exempt activities are included in the facility emission calculations.

There are three processes associated with this emission unit including: 06A-insignificant activities, 06B - storage tanks, and 06C- particulate sources.

Emission unit 000006 is associated with the following emission points (EP): 00114, 00144, 00182, 00199, 00213, 00215

It is further defined by the following process(es):

Process: 06A is located at Building 100 - Process 06A includes the insignificant activities associated with the activities in: (1) Research & Development, (2) Maintenance, and (3) Quality Laboratories.

Process: 06B Process 06B includes VOC storage tanks associated with the Corian Research & Development Activities. This process includes two (2) VOC tanks with a capacity of greater than 750 gallons which are listed below.

Process: 06C is located at Building 100 - Process 06C includes sources which emit particulate emissions from: (1) Research & Development, (2) Maintenance, and (3) Quality Laboratories.

Emission unit 000005 - Emission unit 0-00005 is identified as Corian(R) Raw Materials. This emission unit includes the storage of materials for the manufacturing process. There are two processes associated with this emission unit: - 05B- VOC storage tanks associated with the Corian(R) Raw Materials Area, and 05C - particulate sources.

Emission unit 000005 is associated with the following emission points (EP): 00015, 00021, 00024, 00053, 00133, 00149, 00150, 00151, 00152

It is further defined by the following process(es):

Process: 05A is located at Corian Raw Materials, Building RAW MAT. - Process 05A includes the insignificant activities associated with the manufacturing of Corian(R) Raw Materials Area.

Process: 05B is located at Corian Raw Materials, Building RAW MAT. - Process 05B includes VOC storage tanks associated with the manufacture of Corian(R) Raw Materials Area. This process includes five (5) VOC tanks with a capacity greater than 750 gallons which have been listed below in this permit.

Process: 05C is located at Corian Raw Materials, Building RAW MAT. - Process 05C includes sources which emit particulate emissions from the Corian Raw Materials Area.

Emission unit 000004 - Emission unit 0-00004 is identified as the Corian(R) Sirup Process. During this process methyl methacrylate (cas # 80-62-6) is partially polymerized to polymethyl methacrylate (cas

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9011-14-7) in a continuous reactor. The sirup is stored for use in storage tanks. There is one process associated with this emission unit: - 04A- Insignificant activities associated with Corian(R) Sirup.

Emission unit 000004 is associated with the following emission points (EP):
00136, 00161

It is further defined by the following process(es):

Process: 04A is located at Corian(R) Sirup, Building 200 - Process 04A includes the insignificant activities associated with the manufacturing of Corian(R) Sirup. The sources include the sirup tower.

Emission unit 000003 - Emission unit 0-00003 is identified as Corian(R) Sheet Line #2. Corian is cast as a sheet. The sheet is trimmed, cut, and finished. There are three processes associated with this emission unit: 003- Manufacture of Corian(R) Sheet Line #2 (VOC Sources); 03A- Insignificant activities associated with Corian(R) Sheet Line #2; and, 03C - Manufacture of Corian(R) Sheet Line #2 (particulate sources).

Emission unit 000003 is associated with the following emission points (EP):

00054, 00055, 00056, 00057, 00058, 00059, 00100, 00104, 00109, 00115, 00116, 00140, 00141, 00158, 00159, 00160, 00167

It is further defined by the following process(es):

Process: 003 is located at Corian Sheet Line #2, Building 100 - Process 003 includes the sources which result in volatile organic compound (VOC) emissions during the manufacturing of Corian(R) Sheet Line #2. The manufacturing process consists of combining methyl methacrylate with an inorganic filler, pigment and initiator. The mixture is spread on the casting belt where the continuous sheet is allowed to polymerize and cool.

Process: 03A is located at Corian Sheet Line #2, Building 100 - Process 03A includes the insignificant activities associated with the manufacturing of Corian(R) Sheet Line #2. The sources include: 2nd floor additives, tower, procedyne, essential materials, PMA, and in-line trim saw.

Process: 03C is located at Corian Sheet Line #2, Building 100 - Process 03C includes sources which emit particulate emissions during the manufacture of Corian(R) Sheet Line #2.

Emission unit 000001 - Emission Unit 0-00001 includes a mold injection line for the production of Corian(R) shape products. The mold injection line is identified as Corian(R) Closed Mold Casting (CCMC). Molds are conditioned in a pre-conditioning tunnel. After filling, the molds move through a heat tunnel and then to an unload station. The mold is opened and the product removed. The product is sent to a finishing area. There are three processes associated with this emission unit. The processes include: 001- Manufacture of Corian(R) Closed Mold Casting (VOC sources); 01A- Insignificant activities involved in the manufacture of Corian(R) Closed Mold Castings; and 01C- Manufacture of Corian(R) Closed Mold Casting (

Emission unit 000001 is associated with the following emission points (EP):

00032, 00097, 00099, 00101, 00102, 00103, 00108, 00121, 00163, 00164, 00165, 00200, 0031A

It is further defined by the following process(es):

Process: 001 is located at CCMC, Building 300 - Process 001 includes the sources which result in volatile organic compound (VOC) emissions during the manufacturing of Corian(R) Closed Mold Casting (CCMC). The manufacturing process consists of combining methyl methacrylate with an inorganic filler and minor amounts of other chemicals. The material is then injected into molds and allowed to harden. The molds are opened, the sinks removed and sent to the finishing area.

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Process: 01A is located at CCMC, Building 300 - Process 01A includes the insignificant activities associated with the manufacturing of Corian(R) Closed Mold Casting (CCMC). The sources include the preheat tunnel, curing tunnel, and other maintenance and storage areas.

Process: 01C is located at CCMC, Building 300 - Process 01C includes sources which emit particulate emissions during the manufacture of Corian(R) Closed Mold Casting (CCMC).

Title V/Major Source Status

E I DUPONT YERKES PLANT is subject to Title V requirements. This determination is based on the following information:

The DuPont Yerkes site is classified as a major stationary source based on the following information:

1. A major source is defined as any stationary source or group of stationary sources that are located on one or more contiguous or adjacent properties and are under common control, belonging to a single major industrial grouping. Corian(R)(SIC# 3088) and Tedlar(R) (SIC# 3081) each belong to Major Group 30 - Rubber and Miscellaneous Plastics Products. Both of these business units are located on adjacent properties and are under common control.
2. A major source is defined as any stationary source that emits or has the potential to emit 10 tons per year (tpy) or more of any single hazardous air pollutant, or 25 tpy or more of any combination of hazardous air pollutants. Methylmethacrylate is a hazardous air pollutant used in the production of Corian (R). The actual emissions of methylmethacrylate are approximately 55 tpy which exceeds the criteria of 10 tpy.
3. A major stationary source is defined in a "marginal" nonattainment area and ozone transport region as the potential to emit 50 tpy or more of volatile organic compounds. The total actual amount of volatile organic compounds (VOC) emitted from the Corian (R) and Tedlar (R) processes is greater than 100 tpy.

Program Applicability

The following chart summarizes the applicability of E I DUPONT YERKES PLANT with regards to the principal air pollution regulatory programs:

Regulatory Program	Applicability
PSD	NO
NSR (non-attainment)	NO
NESHAP (40 CFR Part 61)	NO
NESHAP (MACT - 40 CFR Part 63)	YES
NSPS	YES

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TITLE IV	NO
TITLE V	YES
TITLE VI	NO
RACT	YES
SIP	YES

NOTES:

PSD Prevention of Significant Deterioration (40 CFR 52) - requirements which pertain to major stationary sources located in areas which are in attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NSR New Source Review (6 NYCRR Part 231) - requirements which pertain to major stationary sources located in areas which are in non-attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NESHAP National Emission Standards for Hazardous Air Pollutants (40 CFR 61) - contaminant and source specific emission standards established prior to the Clean Air Act Amendments of 1990 (CAAA) which were developed for 9 air contaminants (inorganic arsenic, radon, benzene, vinyl chloride, asbestos, mercury, beryllium, radionuclides, and volatile HAP's)

MACT Maximum Achievable Control Technology (40 CFR 63) - contaminant and source specific emission standards established by the 1990 CAAA. Under Section 112 of the CAAA, the US EPA is required to develop and promulgate emissions standards for new and existing sources. The standards are to be based on the best demonstrated control technology and practices in the regulated industry, otherwise known as MACT. The corresponding regulations apply to specific source types and contaminants.

NSPS New Source Performance Standards (40 CFR 60) - standards of performance for specific stationary source categories developed by the US EPA under Section 111 of the CAAA. The standards apply only to those stationary sources which have been constructed or modified after the regulations have been proposed by publication in the Federal Register and only to the specific contaminant(s) listed in the regulation.

Title IV Acid Rain Control Program (40 CFR 72 thru 78) - regulations which mandate the implementation of the acid rain control program for large stationary combustion facilities.

Title VI Stratospheric Ozone Protection (40 CFR 82, Subparts A thru G) - federal requirements that apply to sources which use a minimum quantity of CFC's (chlorofluorocarbons), HCFC's (hydrofluorocarbons) or other ozone depleting substances or regulated substitute substances in equipment such as air conditioners, refrigeration equipment or motor vehicle air conditioners or appliances.

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RACT Reasonably Available Control Technology (6 NYCRR Parts 212.10, 226, 227-2, 228, 229, 230, 232, 233, 234, 235, 236) - the lowest emission limit that a specific source is capable of meeting by application of control technology that is reasonably available, considering technological and economic feasibility. RACT is a control strategy used to limit emissions of VOC's and NOx for the purpose of attaining the air quality standard for ozone. The term as it is used in the above table refers to those state air pollution control regulations which specifically regulate VOC and NOx emissions.

SIP State Implementation Plan (40 CFR 52, Subpart HH) - as per the CAAA, all states are empowered and required to devise the specific combination of controls that, when implemented, will bring about attainment of ambient air quality standards established by the federal government and the individual state. This specific combination of measures is referred to as the SIP. The term here refers to those state regulations that are approved to be included in the SIP and thus are considered federally enforceable.

Compliance Status

Facility is in compliance with all requirements

SIC Codes

SIC or Standard Industrial Classification code is an industrial code developed by the federal Office of Management and Budget for use, among other things, in the classification of establishments by the type of activity in which they are engaged. Each operating establishment is assigned an industry code on the basis of its primary activity, which is determined by its principal product or group of products produced or distributed, or services rendered. Larger facilities typically have more than one SIC code.

SIC Code	Description
3081	UNSUPPORTED PLASTICS FILM AND SHEET
3088	PLASTICS PLUMBING FIXTURES

SCC Codes

SCC or Source Classification Code is a code developed and used by the USEPA to categorize processes which result in air emissions for the purpose of assessing emission factor information. Each SCC represents a unique process or function within a source category logically associated with a point of air pollution emissions. Any operation that causes air pollution can be represented by one or more SCC's.

SCC Code	Description
3-01-018-22	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PLASTICS PRODUCTION Acrylic Resins
3-01-018-10	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PLASTICS PRODUCTION Conveying



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3-01-018-09	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PLASTICS PRODUCTION Extruder
3-01-018-14	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PLASTICS PRODUCTION Extruder
3-01-018-17	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PLASTICS PRODUCTION General
3-01-018-08	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PLASTICS PRODUCTION Monomer and Solvent Storage
3-01-018-18	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PLASTICS PRODUCTION Reactor
4-01-002-22	ORGANIC SOLVENT EVAPORATION ORGANIC SOLVENT EVAPORATION - DEGREASING 1,1,1-TRICHLOROETHANE (METHYL CHLOROFORM)-CONVEYORIZED VAPOR DEGREASER
3-08-010-07	RUBBER AND MISCELLANEOUS PLASTICS PRODUCTS RUBBER AND MISC PLASTIC PRODUCTS - PLASTIC PRODUCTS MANUFACTURING PLASTIC PRODUCTS MFG: MOLDING MACHINE
4-02-021-40	SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - FLATWOOD PRODUCTS SURFACE PREPARATION (INCL. TEMPERING, SANDING, BRUSHING, GROVE CUT)

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Series code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant, including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount or material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE Range represents an emission range for a contaminant. Any PTE quantity that is displayed represents a facility-wide emission cap or limitation for that contaminant. If no PTE quantity is displayed, the PTE Range is provided to indicate the approximate magnitude of facility-wide emissions for the specified contaminant in terms of tons per year (tpy). The term 'HAP' refers to any of the hazardous air pollutants listed in section 112(b) of the Clean Air Act Amendments of 1990. Total emissions of all hazardous air pollutants are listed under the special NY CAS No. 0NY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is identified in the list below by the (HAP) designation.

Cas No.	Contaminant Name	PTE	
		lbs/yr	Range

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000630-08-0	CARBON MONOXIDE	> 0 but < 2.5 tpy
000075-09-2	DICHLOROMETHANE (HAP)	> 0 but < 10 tpy
0NY100-00-0	HAP	>= 2.5 tpy but < 10 tpy
000080-62-6	METHYL ACRYLIC ACIDMETHYL ESTER (HAP)	>= 10 tpy
0NY210-00-0	OXIDES OF NITROGEN	>= 2.5 tpy but < 10 tpy
0NY075-00-0	PARTICULATES	>= 50 tpy but < 100 tpy
0NY075-00-5	PM-10	>= 50 tpy but < 100 tpy
007446-09-5	SULFUR DIOXIDE	>= 25 tpy but < 40 tpy
000108-88-3	TOLUENE (HAP)	> 0 but < 10 tpy
0NY998-00-0	VOC	>= 250 tpy
001330-20-7	XYLENE, M, O & P MIXT. (HAP)	> 0 but < 10 tpy

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Emergency Defense - 6NYCRR Part 201-1.5

An emergency constitutes an affirmative defense to an action brought for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

(a) The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

- (1) An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;
- (2) The equipment at the permitted facility causing the emergency was at the time being properly operated;
- (3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
- (4) The facility owner and/or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

(b) In any enforcement proceeding, the facility owner and/or operator seeking to establish the occurrence of an emergency has the burden of proof.

(c) This provision is in addition to any emergency or upset provision contained in any applicable requirement.

Item B: Public Access to Recordkeeping for Title V Facilities - 6NYCRR Part 201-1.10(b)

The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance

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certification report pursuant to Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

Item C: Timely Application for the Renewal of Title V Permits - 6 NYCRR Part 201-6.3(a)(4)

Owners and/or operators of facilities having an issued Title V permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

Item D: Certification by a Responsible Official - 6 NYCRR Part 201-6.3(d)(12)

Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Item E: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.5(a)(2)

The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

Item F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.5(a)(3)

This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

Item G: Cessation or Reduction of Permitted Activity Not a Defense - 6NYCRR Part 201-6.5(a)(5)

It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.

Item H: Property Rights - 6 NYCRR Part 201-6.5(a)(6)

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This permit does not convey any property rights of any sort or any exclusive privilege.

Item I: Severability - 6 NYCRR Part 201-6.5(a)(9)

If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.

Item J: Permit Shield - 6 NYCRR Part 201-6.5(g)

All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

- i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;
- ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;
- iii. The applicable requirements of Title IV of the Act;
- iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

Item K: Reopening for Cause - 6 NYCRR Part 201-6.5(i)

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This Title V permit shall be reopened and revised under any of the following circumstances:

- i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.
- ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
- iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.
- iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

Proceedings to reopen and issue Title V facility permits shall follow the same procedures as apply to initial permit issuance but shall affect only those parts of the permit for which cause to reopen exists.

Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in advance of the date that the permit is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

Item L:

Permit Exclusion - ECL 19-0305

The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged

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to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

Item M: Federally Enforceable Requirements - 40 CFR 70.6(b)

All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: General Provisions for State Enforceable Permit Terms and Condition - 6 NYCRR Part 201-5

Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all criteria, emission limits, terms, conditions, and standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Short Description	Condition
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Applicability Discussion:

Mandatory Requirements: The following facility-wide regulations are included in all Title V permits:

ECL 19-301.

This section of the Environmental Conservation Law establishes the powers and duties assigned to the Department with regard to administering the air pollution control program for New York State.

6NYCRR Part 200-.5

Allows for the sealing of non-compliant air contamination sources

6NYCRR Part 200-.6

Acceptable ambient air quality - prohibits contravention of ambient air quality standards without mitigating measures

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6NYCRR Part 200-.7

Anyone owning or operating an air contamination source which is equipped with an emission control device must operate the control consistent with ordinary and necessary practices, standards and procedures, as per manufacturer's specifications and keep it in a satisfactory state of maintenance and repair so that it operates effectively

6NYCRR Part 201-1.2

Any existing emission source that is required to be permitted or registered but has not done so, must apply for the necessary permit or registration. The source is subject to all regulations that were applicable at the time the original permit or registration was required as well as any subsequent applicable requirements that came into effect since.

6NYCRR Part 201-1.4

This regulation specifies the actions and recordkeeping and reporting requirements for any violation of an applicable state enforceable emission standard that results from a necessary scheduled equipment maintenance, start-up, shutdown, malfunction or upset in the event that these are unavoidable.

6NYCRR Part 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6NYCRR Part 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6NYCRR Part 201-3.2(a)

An owner and/or operator of an exempt emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains exempt emission sources or units, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6NYCRR Part 201-3.3(a)

The owner and/or operator of a trivial emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains trivial emission sources or units subject to this Subpart, during normal operating hours, for

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the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6NYCRR Part 201-5

This regulation applies to those permit terms and conditions which are not federally enforceable. It specifies the applicability criteria for state facility permits, the information to be included in all state facility permit applications as well as the permit content, terms of permit issuance, and sets guidelines for modifying state facility permits and allowing for operational flexibility. For permitting purposes, this rule specifies the need to list all emission units except those that are exempt or trivial pursuant to Subpart 201-3 in the permit application and provide a description of the emission unit's processes and products. Finally, this rule also provides the Department the authority to include this and any other information that it deems necessary to identify applicable Federal standards, recordkeeping and reporting requirements, and establish terms and conditions that will ensure compliance with the national ambient air quality standards.

6NYCRR Part 201-6

This regulation applies to those terms and conditions which are subject to Title V permitting. It establishes the applicability criteria for Title V permits, the information to be included in all Title V permit applications as well as the permit content and terms of permit issuance. This rule also specifies the compliance, monitoring, recordkeeping, reporting, fee, and procedural requirements that need to be met to obtain a Title V permit, modify the permit and demonstrate conformity with applicable requirements as listed in the Title V permit. For permitting purposes, this rule specifies the need to identify and describe all emission units, processes and products in the permit application as well as providing the Department the authority to include this and any other information that it deems necessary to determine the compliance status of the facility.

6NYCRR 201-6.5(a)(4)

This mandatory requirement applies to all Title V facilities. It requires the permittee to provide information that the Department may request in writing, within a reasonable time, in order to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The request may include copies of records required to be kept by the permit.

6NYCRR 201-6.5(a)(7)

This is a mandatory condition that requires the owner or operator of a facility subject to Title V requirements to pay all applicable fees associated with the emissions from their facility.

6NYCRR 201-6.5(a)(8)

This is a mandatory condition for all facilities subject to Title V requirements. It allows the Department to inspect the facility to determine compliance with this permit, including copying records, sampling and monitoring, as necessary.

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6NYCRR Part 201-6.5(c)

This requirement specifies, in general terms, what information must be contained in any required compliance monitoring records and reports. This includes the date, time and place of any sampling, measurements and analyses; who performed the analyses; analytical techniques and methods used as well as any required QA/QC procedures; results of the analyses; the operating conditions at the time of sampling or measurement and the identification of any permit deviations. All such reports must also be certified by the designated responsible official of the facility.

6NYCRR Part 201-6.5(c)(2)

This requirement specifies that all compliance monitoring and recordkeeping is to be conducted according to the terms and conditions of the permit and follow all QA requirements found in applicable regulations. It also requires monitoring records and supporting information to be retained for at least 5 years from the time of sampling, measurement, report or application. Support information is defined as including all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

6NYCRR Part 201-6.5(c)(3)(ii)

This regulation specifies any reporting requirements incorporated into the permit must include provisions regarding the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6NYCRR 201-6.5(d)(5)

This condition applies to every Title V facility subject to a compliance schedule. It requires that reports, detailing the status of progress on achieving compliance with emission standards, be submitted semiannually.

6NYCRR Part 201-6.5(e)

Sets forth the general requirements for compliance certification content; specifies an annual submittal frequency; and identifies the EPA and appropriate regional office address where the reports are to be sent.

6NYCRR 201-6.5(f)(6)

This condition allows changes to be made at the facility, without modifying the permit, provided the changes do not cause an emission limit contained in this permit to be exceeded. The owner or operator of the facility must notify the Department of the change. It is applicable to all Title V permits which may be subject to an off permit change.

6NYCRR Part 202-1.1

This regulation allows the department the discretion to require an emission test for the purpose of determining compliance. Furthermore, the cost of the test, including

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the preparation of the report are to be borne by the owner/operator of the source.

6NYCRR Part 202-2.1

Requires that emission statements shall be submitted on or before April 15th each year for emissions of the previous calendar year.

6NYCRR Part 202-2.5

This rule specifies that each facility required to submit an emission statement must retain a copy of the statement and supporting documentation for at least 5 years and must make the information available to department representatives.

6NYCRR Part 211-.2

This regulation prohibits any emissions of air contaminants to the outdoor atmosphere which may be detrimental to human, plant or animal life or to property, or which unreasonably interferes with the comfortable enjoyment of life or property regardless of the existence of any specific air quality standard or emission limit.

6 NYCRR Part 211.3

This condition requires that the opacity (i.e., the degree to which emissions other than water reduce the transmission of light) of the emissions from any air contamination source be less than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent.

6 NYCRR Part 215

Prohibits open fires at industrial and commercial sites.

40 CFR Part 68.

This Part lists the regulated substances and their applicability thresholds and sets the requirements for stationary sources concerning the prevention of accidental releases of these substances.

40 CFR Part 82, Subpart F

Subpart F requires the reduction of emissions of class I and class II refrigerants to the lowest achievable level during the service, maintenance, repair, and disposal of appliances in accordance with section 608 of the Clean Air Act Amendments of 1990. This subpart applies to any person servicing, maintaining, or repairing appliances except for motor vehicle air conditioners. It also applies to persons disposing of appliances, including motor vehicle air conditioners, refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment. Those individuals, operations, or activities affected by this rule, may be required to comply with specified disposal, recycling, or recovery practices, leak repair practices, recordkeeping and/or technician certification requirements.

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Facility Specific Requirements

In addition to Title V, E I DUPONT YERKES PLANT has been determined to be subject to the following regulations:

40CFR 60-Kb.110b (c)

This regulation exempts from the General Provisions of 40 CFR 60 Subpart A, storage vessels with a capacity greater than or equal to 151 m³ storing a liquid with a maximum true vapor pressure less than 3.5 kPa or with a capacity greater than or equal to 75 m³ but less than 151m³ storing a liquid with a maximum true vapor pressure less than 15.0 kPa.

40CFR 60-Kb.116b (b)

Owners or operators of affected storage tanks with capacities greater than or equal to 10,000 gallons must keep records of the tanks dimensions and an analysis of its capacity for the life of the tank. If the tank's capacity is less than 20,000 gallons, then it is subject to no other provisions of this subpart.

40CFR 63-JJJJ.3330 (a)

Statement of MACT requirement (paper and other web coating processes) applicability with a compliance date of December 5, 2005.

40CFR 63-JJJJ.3350 (e)

MACT requirement (paper and other web coating processes) applicability. This portion of the rule requires the continuous monitoring of inlet temperature to the oxidizer with a specified minimum as well as the monitoring of differential temperature across the catalyst bed. Details on record keeping calibration specifications etc. are also specified. This process was previously regulated under 6 NYCRR part 212. Condition 212.11(b)(1) has been removed from the existing permit since this condition is as stringent.

40CFR 63-JJJJ.3350 (f)

This portion of the MACT regulation requires the development of a site specific monitoring plan for the capture and control system.

40CFR 63-JJJJ.3370 (g)

This condition is a statement of requirements if complying with the MACT limit of 0.04 kg organic HAP emitted/kg coating material applied.

40CFR 63-JJJJ.3370 (k) (1)

This condition requires the initial demonstration of compliance through the performance of tests for capture and control efficiency. Related conditions for site specific monitoring plans, oxidizer temperatures etc. are tied to the results of this test. Dupont completed this test in the fall of 2005.

40CFR 63-JJJJ.3370 (k) (2) (i)

This condition specifies the formula to be used for determining control efficiency.

40CFR 63-JJJJ.3370 (k) (2) (ii)

This condition reference equation 12 in the regulation for determining organic HAP emitted during the month.

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40CFR 63-JJJJ.3370 (k) (2) (iv)

This condition specifies the use of equation 10 for calculating HAP emission rate based on coating material applied.

40CFR 63-JJJJ.3400 (c)

This condition the requirement for submission of semi-annual compliance reports and details due dates and required information. This is very similar the the states part 201-6.5 requiremnts for semi annual reports.

40CFR 63-JJJJ.3400 (g)

This condition requires the submission of startup, shutdown, and malfunction reports.

40CFR 63-T.462 (a) (2)

This paragraph states that a tight fitting cover and a freeboard ratio of at least 0.75 must be used to minimize solvent loss unless complying with paragraph (a)(1) of this section.

40CFR 63-T.463

This regulation outlines the control requirements for owner or operators of batch vapor and in-line cleaning machines. Among the requirements are when and how the machine is to be covered; the freeboard ratio of the cleaning tank, the need and specifications of vapor control devices and emission limits for the machines.

40CFR 63-T.463 (b) (1) (i)

This reference lists the ten control equipment options for batch vapor solvent cleaning machines with an opening of 13 square feet or less. However, other equivalent methods of control can be established.

40CFR 63-T.463 (d)

This reference is the heading to all of the required work and operational practices that existing and new in-line and batch vapor solvent cleaning machines must meet.

40CFR 63-T.463 (e) (2) (i)

This reference provides the freeboard refrigeration device standards that must be met during each monitoring period.

40CFR 63-T.467 (a)

This reference requires specific records to be kept, for solvent cleaning machines subject to this section, for the lifetime of the machine.

40CFR 63-T.467 (b)

This reference requires specific records to be kept, for solvent cleaning machines subject to this section, for a period of five years.

40CFR 63-T.468 (c)

This reference provides the compliance report requirements for batch cold solvent cleaning machines which are subject to this subdivision. For existing units, this report should have been submitted to the EPA within 150 days of the compliance date. For new units, this report must be submitted to the EPA within 150 days of startup or May1, 1995, whichever is later.

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40CFR 63-T.468 (f)

This reference provides the annual report requirements for batch vapor and in-line solvent cleaning machines which are subject to this subdivision (i.e., complying with the provisions in section 63.463). Each annual report must be submitted by February 1.

40CFR 63-T.468 (h)

This reference provides the exceedance report requirements for batch vapor and in-line solvent cleaning machines. An exceedance report must be submitted to the EPA on a semiannual basis, unless the EPA determines that more frequent reporting is needed or if an exceedance has occurred. If an exceedance occurs, the reporting frequency will be changed to quarterly.

6NYCRR 200 .1

This section contains a definition of terms referred to throughout New York's entire codes, rules and regulations.

6NYCRR 200 .3

No person shall make a false statement in connection with applications, plans, specifications and/or reports submitted pursuant to this Subchapter.

6NYCRR 201-6.5 (c) (3) (ii)

This regulation specifies any reporting requirements incorporated into the permit must include provisions regarding the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6NYCRR 201-6.5 (f)

This regulation defines in general terms under what circumstances changes would be allowed without a permit modification provided the permit contains sufficient operational flexibility provisions.

6NYCRR 201-7

This regulation sets forth an emission cap that cannot be exceeded by the facility. In this permit that cap is

6NYCRR 212 .10

The DuPont facility is subject to this regulation since the annual potential to emit VOCs is greater than 50 tons or more of volatile organic compounds. As such, Dupont was required to submit a compliance plan to the department by October 20, 1994. The compliance plan must either include a reasonably available control technology (RACT) analysis or a plan to limit the annual potential to emit below the applicability levels. DuPont submitted a compliance plan, dated February 9, 1995, and an updated compliance plan on January 31, 2001. The department has reviewed and determined there is sufficient information to accept a lesser degree of control.

6NYCRR 212 .11 (b) (4)

The refrigerator condenser on the Tedlar line is subject to this requirement and must monitor the outlet gas temperature.

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6NYCRR 212 .11 (b) (5)

This regulation is applicable to other parameters, not previously identified in the regulation, which are important to the operation of control equipment. One such parameter is as follows:

An important factor affecting the proper operation of a catalytic oxidizer system is the catalyst. The life of the catalyst is dependent on several problems including, (1) thermal aging, (2) burnout due to high temperature fluctuations, (3) particulate masking, and (4) poisoning by non-VOC contaminants entrained in the gas stream. Thermal aging of the catalyst is inevitable due to the exposure of hot combustion products. Because of this problem, all noble metal catalysts must eventually be replaced with fresh catalyst.

6NYCRR 212 .4 (c)

This rule requires existing sources (in operation after July 1, 1973) of solid particulates with environmental rating of B or C which are not subject to Table 5 "Processes for which Permissible Emission Rate is Based on Process Weight, to be limited to a particulate emission rate not to exceed 0.05 grains per dry standard cubic foot.

6NYCRR 212 .6 (a)

This rule specifies an opacity limitation of less than 20% for any six consecutive minute period for all process emission sources.

6NYCRR 229 .1 (d) (2) (v)

The size of the six tanks subject to this regulation range between 20,000 and 34,000 gallons. The volatile organic liquids stored in the tanks are methylmethacrylate and dimethylacetimide. The maximum true vapor pressure of methylmethacrylate at 26 degrees Celsius is 0.77 psia. The maximum true vapor pressure of dimethylacetimide at 25 degrees Celsius is 0.03 psia. Thus, based on this information, the storage tanks contain liquids with a maximum true vapor pressure less than 4.0 psia and, therefore, are not required to meet the control requirements of section 229.3(e)(1).

6NYCRR 229 .3 (e) (2) (iv)

This section requires a tank with submerged fill for storage of volatile organic liquids

6NYCRR 229 .3 (e) (2) (v)

This section requires the tank to be equipped with conservation vents for storage of volatile organic liquids. DuPont requested a variance for five storage vessels on June 9, 1995. The department has indicated the variance will be granted. The five storage tanks are identified as emission sources: S0019, S0018, S0122, S0123, S0124

6NYCRR 231-1

Requirements for emission sources subject to the regulation prior to November 15, 1992.

Compliance Certification

Summary of monitoring activities at E I DUPONT YERKES PLANT:

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Location Facility/EU/EP/Process/ES	Type of Monitoring	Cond No.
FACILITY	monitoring of process or control device parameters as surrogate	43
FACILITY	record keeping/maintenance procedures	44
0-00010	monitoring of process or control device parameters as surrogate	2-23
0-00010	record keeping/maintenance procedures	2-24
0-00010	record keeping/maintenance procedures	2-25
0-00010	intermittent emission testing	2-26
0-00010	record keeping/maintenance procedures	2-27
0-00010	record keeping/maintenance procedures	2-28
0-00010	record keeping/maintenance procedures	2-29
0-00010	record keeping/maintenance procedures	2-30
0-00010	record keeping/maintenance procedures	2-31
0-00003/00058/003/S0058	record keeping/maintenance procedures	49
U-00003	monitoring of process or control device parameters as surrogate	3-2
U-00003	monitoring of process or control device parameters as surrogate	3-4
U-00003	record keeping/maintenance procedures	3-5
U-00003	record keeping/maintenance procedures	3-6
U-00003	record keeping/maintenance procedures	3-7
U-00003	record keeping/maintenance procedures	3-8
FACILITY	record keeping/maintenance procedures	26
FACILITY	record keeping/maintenance procedures	27
FACILITY	record keeping/maintenance procedures	28
0-00010/00027/010/S0027	monitoring of process or control device parameters as surrogate	2-32
FACILITY	record keeping/maintenance procedures	31
FACILITY	record keeping/maintenance procedures	38
0-00009/0002A/009/K002B	monitoring of process or control device parameters as surrogate	52
0-00009/0002A/009/K002A	monitoring of process or control device parameters as surrogate	51
0-00009/0004A/009/K004A	monitoring of process or control device parameters as surrogate	53
0-00010/00027/010/K0027	monitoring of process or control device parameters as surrogate	56
FACILITY	monitoring of process or control device parameters as surrogate	2-19
FACILITY	monitoring of process or control device parameters as surrogate	34
FACILITY	monitoring of process or control device parameters as surrogate	35
FACILITY	monitoring of process or control device parameters as surrogate	2-20
FACILITY	monitoring of process or control device parameters as surrogate	36
FACILITY	monitoring of process or control device parameters as surrogate	37
FACILITY	record keeping/maintenance procedures	40
FACILITY	record keeping/maintenance procedures	41
FACILITY	record keeping/maintenance procedures	42

Basis for Monitoring

The DuPont Yerkes Title V permit specifies special operating/monitoring conditions, record keeping and reporting required to verify compliance with the applicable requirements. The basis for monitoring for these requirements is as follows:

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6NYCRR Part 201-6.5(f):

In accordance with 6NYCRR201-6.5(f), E.I. duPont de Nemours & Company, Inc. has the ability to maintain operational flexibility. This permit condition specifies the conditions under which operational flexibility can be performed at the facility. In addition, this monitoring condition requires DuPont to maintain records and provide the Department with sufficient documentation that the changes are insignificant and in compliance with applicable regulations.

6NYCRR Part 212.4(c) and 6NYCRR Part 212.6(a):

The general process regulations of Part 212 specify a limit on solid particulate discharges. The solid particulate emission sources at DuPont were categorized into two general categories, identified as Direct Discharge Process Equipment and Particulate Control Equipment. The categories were developed to better define appropriate monitoring parameters for the two types of solid particulate emission sources. The monitoring parameters were developed to provide a good degree of confidence that the specific particulate emission limits are being maintained. It is believed that the frequency and type of monitoring requested will identify any potential problems prior to an emission limit exceedance. Thus, these monitoring parameters should be used as an indicator that a problem may exist and not be interpreted as a violation of an emission limit.

6NYCRR Part 212.11:

Permit conditions were developed in accordance with the sampling and monitoring requirements specified in Part 212.11. The monitoring requirements for control equipment, such as catalytic oxidizers, refrigerated condensers, and wet scrubbers, were developed to aid in the determination of proper operation of the equipment. The conditions may specify a temperature or pressure reading. Specific temperature and pressure values were included in the permit condition to be used as guidance. Any deviation from the values should not be interpreted as a violation but rather an indication to research a possible problem.

6NYCRR Part 229:

The volatile organic liquid storage regulations specify a control requirement which includes use of either submerged fill or conservation vents. The size of the tank determines which control is required. An annual inspection of these control equipment strategies was specified in the monitoring conditions. The requirement of an annual inspection appears to be adequate in determining compliance with this requirement since the submerged fill lines and conservation vents are a permanent part of the tank. As such, malfunction or damage of this equipment is not expected.